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20 *Class Counsel*

21 *(additional Plaintiffs' counsel appear on the*  
22 *signature block)*

23 **UNITED STATES DISTRICT COURT**  
24 **CENTRAL DISTRICT OF CALIFORNIA**  
25 **SOUTHERN DIVISION**

26 In re: Shimano Crankset Litigation

27 Case No.: 8:23-cv-02038-JVS(JDEx)

28 **PLAINTIFFS' NOTICE OF MOTION**  
**AND MOTION FOR FINAL**  
**APPROVAL OF CLASS**  
**SETTLEMENT**

Date: February 2, 2026  
Time: 1:30 p.m.  
Courtroom: 10C  
Judge: Hon. James V. Selna

1           **PLEASE TAKE NOTICE** that at 1:30 p.m. on February 2, 2026, or as soon  
2 thereafter as the matter may be heard, in the courtroom of the Honorable James V.  
3 Selna, located at the Ronald Reagan Federal Building and U.S. Courthouse, 411  
4 West 4th Street, Courtroom 10C, Santa Ana, California 92701, Plaintiffs Steven  
5 Adelman, Jose Delgado, Jose Erazo, Dave Gonyer, Jarett Hawkins, Christopher  
6 Jennings, Moussa Kouyate, Marcus Lewis, Kevin Litam, Maurice Scorsolini,  
7 Dimitri Semizarov, and Mike Tirado (“Plaintiffs”) will, and hereby do, move for an  
8 order of the Court to finally approve the class action Settlement and reaffirm its  
9 certification of the Settlement Class.

10           Plaintiffs’ unopposed Motion is based on this Notice; the accompanying  
11 Memorandum of Law; the Joint Declaration of Roland Tellis, Stephen Larson, and  
12 Jason Lichtman in Support of Motion for Final Approval of Class Action  
13 Settlement; the Declaration of Jeffrey H. Kinrich; the Declaration of Cameron R.  
14 Azari, Esq. Regarding Implementation and Adequacy of Notice Plan; all other facts  
15 the Court may or should take notice of, all filings, records, and proceedings in this  
16 case, and any oral argument that the Court may entertain.

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18       Dated: November 18, 2025   By: /s/ Roland Tellis

19                               Roland Tellis (SBN 186269)  
20                               David Fernandes (SBN 280944)  
21                               Sterling Cluff (SBN 267142)  
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*Counsel for Plaintiffs and the Proposed  
Settlement Class*

*\*Admitted pro hac vice*